

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

NOTICE OF MOTION
07 Cr 1041 (LTS)

YUSEF GREEN,

Defendant.
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PLEASE TAKE NOTICE, that upon the annexed affidavits of JOYCE C. LONDON, Esq. and defendant Yusef Green, dated March 10, 2008, the accompanying Memorandum of Law, the Indictment and all prior proceedings and pleadings had herein, the defendant, Yusef Green, by his attorneys, JOYCE C. LONDON and VALERIE VAN LEER-GREENBERG, will move this United States District Court for the Southern District of New York before the Honorable Laura T Swain on March 14, 2008 at 3:45 p.m. at the United States District Courthouse, Southern District of New York, 500 Pearl Street, New York, New York 10007 for the following relief:

1. An order pursuant to Rule 12(b)(3)(A) of the Federal Rules of Criminal Procedure suppressing any and all evidence seized as a result of the search of Yusef Green's car on the grounds that there was no reasonable suspicion for the stop of Green's vehicle, or in the alternative, a hearing should be held with respect to the disputed facts.

2. An order pursuant to Rule 16(a)(C)(1) of the Federal Rules of Criminal Procedure directing the government to disclose any and all prior immoral or illegal acts and/or criminal convictions of the defendant which the government would seek to introduce against the defendant at least thirty days prior to trial so that the defendant may move to preclude the introduction of such evidence in accordance with Rules 403 and 404(b) of the Federal Rules of Evidence;

3. An order permitting defendant Green to make such other and further motions as may be appropriate and necessary; and

4. For such other and further relief which this Court may seem just and proper.

Dated: New York, New York
March 11, 2008

Yours etc.,

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and

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*Attorneys for Defendant
YUSEF GREEN*

To: Clerk of the Court (By ECF)
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Honorable Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

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